

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In RE: Michele J. Bergman Leonard S. Bergman Debtors  The Bank of New York Mellon FKA The bank of New York, as Trustee for the Certificate holders of CWALT, Inc. Alternative Loan Trust 2006- OA11, Mortgage Pass-Through Certificates, Series 2006-OA11 Movant  V  Michele J. Bergman Leonard S. Berman Respondent	Case No.:20-12276-MDC Chapter 13  Hearing Date: 7/16/2020
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**DEBTOR'S RESPONSE TO CREDITOR'S OBJECTION TO CONFIRMATION OF CHAPTER  
13 PLAN**

To the Honorable Judges of the United States Bankruptcy Court for the Eastern of Pennsylvania:

The Debtor in this matter, Michele Bergman and Leonard Bergman, by counsel, responds to the Trustee's Motion to Dismiss as follows:

1. Debtor denies that a proof of claim was filed. Creditor filed this objection on May 27, 2020 claiming there was a secured proof of claim filed on July 21, 2020. Debtor cannot see the future if the creditor filed a proof of claim.
2. Admitted, Debtor's plan provides for prepetition in the amount of 18,496.28. This amount is current to May 12, 2020. On June 1, 2020. Debtor made payment directly to secured creditor in the amount of mortgage of \$1,515.56.
3. Denied. The plan states the correct value of the secured claim as of filing on May 12, 2020. Debtor denies creditor proof of claim.

4. Denied. The debtor's plan fully compensate the Secured Creditor
5. Denied. This statement fails to state a cause of action. The plan complies with 11U.S.C. §§ 1322 and 1325.

WHEREFORE, Debtor prays that the Creditor's objection be dismissed.

Date: 06/18/2020

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